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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-CV-5944 SC
MDL No. 1917

This Document Relates To:

Case No. 2011-CV-6205 SC

STATE OF FLORIDA,
OFFICE OF THE ATTORNEY GENERAL,
DEPARTMENT OF LEGAL AFFAIRS,

Plaintiff,

v.

LG ELECTRONICS, INC., *et al.*

Defendants.

**DECLARATION OF SATU A. CORREA
IN SUPPORT OF MOTION TO SHORTEN
TIME ON STATE OF FLORIDA'S
MOTION TO SERVE DEFENDANT
BEIJING-MATSUSHITA COLOR CRT
CO., LTD. THROUGH ITS U.S. COUNSEL
PURSUANT TO FED. R. CIV. P. 4(f)(3)**

Date: N/A

Time: N/A

Location: JAMS, Two Embarcadero Center,
Suite 1500

Judge: Hon. Samuel Conti

Special Master: Hon. Charles A. Legge (Ret.)

DECLARATION OF SATU A. CORREA

I, Satu A. Correa, hereby declare as follows:

1. I am an Assistant Attorney General with the Florida Office of the Attorney General and I represent the State of Florida ("Florida") in the above-captioned action as well as the related multidistrict litigation captioned *In re Cathode Ray Tube (CRT) Antitrust Litigation*, 3:07-cv-05944-SC (the "MDL"), which are currently pending in the United States District Court for the Northern District of California.

2. I have personal knowledge of the matters stated herein and I could, and would, competently testify thereto if called as a witness.

3. I am a member in good standing of the State Bar of Florida and admitted to practice before the United States District Court for the Northern District of Florida. I am admitted to practice *pro hac vice* in the MDL pending in the United States District Court for the Northern District of California.

4. I submit this declaration in accordance with Civil L.R. 6-3 to set forth facts in support of the Motion to Shorten Time on State of Florida's Motion to Serve Defendant Beijing-Matsushita Color CRT Co., Ltd. ("BMCC") Through Its U.S. Counsel Pursuant to Fed. R. Civ. P. 4(f)(3) filed concurrently herewith.

5. In a stipulation filed with the Court on March 23, 2012 (the "Service Stipulation"), twenty-four Defendants stipulated to the waiver of service of process in Florida's action. *See* Docket No. 1108. BMCC was not one of the Defendants who joined in the Service Stipulation.

6. On April 25, 2012, I contacted Freshfields Bruckhaus Deringer US LLP ("Freshfields"), counsel for BMCC, to obtain BMCC's agreement to have Florida's Motion to Serve Defendant Beijing-Matsushita Color CRT Co., Ltd. Through Its U.S. Counsel Pursuant to

1 Fed. R. Civ. P. 4(f)(3) (“Florida’s Motion to Serve”) heard in conjunction with the hearing on the
 2 Direct Action Plaintiffs’ Motion to Serve Defendants Chunghwa Picture Tubes Ltd., Beijing
 3 Matsushita Color CRT Co., Ltd., and LG Electronics Taiwan Taipei Co. Through Their U.S.
 4 Counsel Pursuant to Fed. R. Civ. P. 4(f)(3) on May 22, 2012. That same day, counsel for BMCC
 5 responded that BMCC had not retained Freshfields to represent it in Florida’s action and hence
 6 could not provide a response to Florida’s request to shorten the time on its motion to serve
 7 BMCC through U.S. counsel.
 8

9 7. On April 10, 2012, the Direct Action Plaintiffs’ filed a Motion to Serve
 10 Defendants Chunghwa Picture Tubes Ltd., Beijing Matsushita Color CRT Co., Ltd., and LG
 11 Electronics Taiwan Taipei Co. Through Their U.S. Counsel Pursuant to Fed. R. Civ. P. 4(f)(3)
 12 (“DAPs’ Motion to Serve”), setting the hearing for May 15, 2012, at 10:00 a.m. *See* Docket No.
 13 1147. By a stipulation filed on April 20, 2012, the hearing on the DAP’s Motion to Serve was
 14 extended to until May 22, 2012, at 10:00 a.m. *See* Docket No. 1160. Today I was made aware
 15 that the hearing on the DAP’s Motion to Serve is now being held on May 21, 2012, at 10:00 a.m.
 16
 17

18 8. Florida’s Motion to Serve and the DAPs’ Motion to Serve both seek to effect
 19 service on Defendant BMCC through its U.S. counsel.

20 9. The requested time modification will not have an effect on the case schedule in
 21 Florida’s action or in the MDL.

22 I declare under penalty of perjury under the laws of the United States of America that the
 23 foregoing is true and correct.
 24

25 Executed this 27th day of April, 2012, in Tallahassee, Florida.

26
 27 /s/ Satu A. Correa
 Satu A. Correa
 28